

February 11, 2003

Select Agent Program
Centers for Disease Control and Prevention
1600 Clifton Road, E-79
Atlanta, GA 30333

Subject: Interim Final Rule on Possession, Use, and Transfer of Select Agents and Toxins, 67 FR
76886

We would like to take this opportunity to comment on the Interim Final Rule on Possession, Use, and Transfer of Select Agents and Toxins, 67 FR 76886. In summary, we support the comments submitted by the Council on Government Relations (COGR) as it relates to this legislative issue. Of particular importance to Purdue University are the following items with our recommendations:

73.7 Registration

Include a process by which the University can continue its research with select agents and toxins until reviews and responses to the University's application for risk assessment and registration are complete.

73.8 - Security Risk Assessment

Clarify who at a university must obtain a security risk assessment, other than the Responsible Official and individuals who access a select agent or toxin.

73.11 Security Plan

Clarify that entities have discretion to define "area" when their security plans are formulated. In addition, "access" should be specifically defined as: "The ability to gain physical control of select agents and toxins."

We fully support the legislation to address security issues as it relates to the use of select agents and toxins and we believe that the research and education conducted by Purdue University is a critical part of protecting the public from the threat of bioterrorism. The ability to meet these regulations with flexible performance based regulations is most important to allow us to continue our important work. Thank you for this opportunity to make comments on this critical issue.

Sincerely,



Kenneth P. Burns
Executive Vice President and Treasurer